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ATTORNEYS FOR DEBTORS
AND DEBTORS IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:	§	Chapter 11
	§	
NGV GLOBAL GROUP, INC., <i>et al.</i> , ¹	§	Case No. 22-42780-MXM-11
	§	
Debtors.	§	(Jointly Administered)
	§	

**DEBTORS' THIRD MOTION REQUESTING AN EXTENSION OF TIME TO FILE
SCHEDULES AND STATEMENTS OF FINANCIAL AFFAIRS**

NGV Global Group, Inc. ("NGV Global"), Natural Gas Vehicles Texas, Inc. ("NGV Texas"), Natural Gas Supply, LLC ("NGS"), and Natural Gas Logistics Inc. ("NGL", and collectively with NGV Global, NGV Texas, and NGS, the "Debtors"), as debtors-in-possession, file this *Third Motion Requesting an Extension of Time to File Schedules and Statements of Financial Affairs* ("Motion"), and respectfully represent as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This case and all related matters have been referred to this Court pursuant to 28 U.S.C. § 157. This

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: NGV Global Group, Inc. (9723), Natural Gas Vehicles Texas, Inc. (8676), Natural Gas Supply, LLC (4584) and Natural Gas Logistics Inc. (5403).

Motion constitutes a “core” proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (D), (M) and (O).

Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

PROCEDURAL BACKGROUND

2. On November 17, 2022 (The “Petition Date”), the Debtors filed voluntary petitions in this court for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

3. The Debtors continue to manage and operate their businesses as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No trustee, examiner, or committee has been appointed in these cases.

4. On November 22, 2022, the Court entered an Order providing for the joint administration of the Debtors’ cases [Docket no. 28].

5. On December 28, 2022, the Debtors filed *Debtors’ Second Motion Requesting an Extension of Time to File Schedules and Statement of Financial Affairs* [Docket No. 91], requesting an extension of the deadline for filing or providing schedules, statements and other documents required by, *inter alia*, section 521 of the Bankruptcy Code, Bankruptcy Rule 1007, and N.D. Tex. L.B.R. 1007-1 (collectively, the “Schedules and Statements”).

6. On December 30, 2022, the Court entered its *Order Granting Debtors’ Motion Requesting an Extension of Time to File Schedules and Statements of Financial Affairs* [Docket No. 93] extending the deadline for filing Schedules and Statements to January 17, 2023.

RELIEF REQUESTED

7. The Debtors request a one-day extension of the period in which to complete and file their Schedules and Statements. The current deadline for the Debtors to file their Schedules and Statements is January 17, 2023. The Schedules are essentially completed but the Debtors

require an additional day to review and finalize the drafted Schedules and Statements. The Debtors seek an extension to file their Schedules and Statements through and including **January 18, 2023**.

8. The Debtors submit that cause exists to grant the requested extension to file their Schedules and Statements pursuant to Bankruptcy Rule 1007(c). The Debtors believe that additional time beyond the current deadline will be required to compile the significant number of documents and financial information necessary to prepare the Schedules and Statements. The Debtors' prior CFO, who had been working with counsel to prepare the Schedules and Statements, resigned as of December 16, 2022. The Debtors have recently hired a new CFO and have retained a Financial Advisor as of January 11, 2023, to assist with preparation of the Schedules and Statements. The process of preparing the Schedules and Statements has required additional time for the new CFO and Financial Advisors to become familiar with the financial affairs of the Debtors and to gather all of the information needed to prepare the Schedules and Statements for four (4) separate Chapter 11 Debtors. The amount of time required to prepare the Schedules and Statements, in addition to the time required for the Debtors to fulfill other burdens associated with the commencement of these cases, necessitate the extension requested herein.

9. The extension requested herein will not prejudice any creditor or other party in interest. The meeting of creditors commenced on January 9, 2023 and was adjourned to January 25, 2023 at 1:30 p.m.. If this Motion is granted, the Schedules and Statements will be filed seven (7) days in advance of the reset 341 meeting, affording sufficient time to all creditors and parties in interest to review such Schedules and Statements prior to the reconvened 341 meeting.

COMPLIANCE WITH LOCAL BANKRUPTCY RULE 1007-1

10. Pursuant to Local Bankruptcy Rule 1007-1, the undersigned represents that the United States Trustee has been contacted regarding the relief requested in this Motion but has not yet indicated the UST's consent or opposition to the Motion.

PRAYER

WHEREFORE, the Debtors respectfully request entry of an order: (i) extending the Debtors' deadline to file the Schedules and Statements through and including January 18, 2023, and (ii) granting such further relief as is just and proper.

Dated: January 17, 2023.

Respectfully submitted,

/s/ Lynda L. Lankford
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ATTORNEYS FOR THE DEBTORS AND
DEBTORS-IN-POSSESSION

CERTIFICATE OF CONFERENCE

I hereby certify that on January 17, 2023, I sent an email correspondence to Elizabeth Young and Erin Schmidt, trial attorneys in the Office of the United States Trustee, regarding the Motion. As of the filing of this Motion, neither Ms. Young nor Ms. Schmidt has indicated a position on the Motion.

/s/ Lynda L. Lankford
Lynda L. Lankford

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon the office of the United States Trustee for the Northern District of Texas, the secured lenders, the holders of the twenty (20) largest unsecured claims against the Debtors, and parties filing a notice of appearance, as indicated on the attached Service List, on January 17, 2023 via ECF electronic Notice, if available, and on January 18, 2023 via United States Mail, first class postage prepaid.

/s/ Lynda L. Lankford
Lynda L. Lankford

L:\JPROSTOK\Natural Gas Logistics, Inc. (NGV Global) #6321 WO\Pleadings\Third Motion to Extend Deadline to File Schedules 1.17.23.docx

Limited Service List
NGV Global, et al.
#6321

NGV Global Group, Inc., et al.
Attn: Farroukh Zaidi, CEO
10733 Spangler Road
Dallas, TX 75222

Erin Schmidt, Trial Attorney
Office of the U.S. Trustee
1100 Commerce St., Room 976
Dallas, TX 75202

FirstCapital Bank of Texas, N.A.
5580 LBJ Freeway, Suite 100
Dallas, TX 75240

Tom McLeod Software Corp.
100 Corporate Parkway, Suite 100
Birmingham, AL 35242

Ford Motor Credit Company, LLC
PO Box 680020, MD 610
Franklin, TN 37068

Maplemark Bank
4143 Maple Ave., Suite 100
Dallas, TX 75219

Bank of DeSoto, NA
PO Box 7777
DeSoto, TX 75123

Mike Albert, Ltd.
10340 Evendale Dr.
Cincinnati, OH 45241

Simmons Bank
4625 S National Ave.
Springfield, MO 65810

Tristate Capital Bank
One Oxford Centre
301 Grant St., Suite 2700
Pittsburgh, PA 15219

Vision Financial Group, Inc.
615 Iron City Drive
Pittsburgh, PA 15205

Internal Revenue Service
Centralized Insolvency Operations
PO Box 21126
Philadelphia, PA 19114-0326

AmeriCredit Financial Services, Inc.
dba GM Finance
PO Box 183853
Arlington, TX 76096

Ford Motor Credit Company LLC
c/o National Bankruptcy Service Center
P.O. Box 62180
Colorado Springs, CO 80962-2180

NGV Global Group, Inc.
20 Largest Unsecured Creditors

Addison Group
7076 Solutions Center
Chicago, IL 60677-7000

AFCO
5600 North River Rd.
Suite 400
Rosemont, IL 60018-5187

ANGI
PO Box 516
Janesville, WI 53547-5216

Archerpoint
2405 Satellite Blvd., Suite 225
Duluth, GA 30096

Bridgestone
PO Box 730026
Dallas, TX 75373-0026

Comdata
5301 Mayland Way
Brentwood, TN 37027

Dallas Regional Chamber
500 N. Akard St., Suite 2600
Dallas, TX 75201

Faisal Reza
3604 Barrydale Dr.
Denton, TX 76208

Mark Conner, CPA PLLC
PO Box 2709
Coppell, TX 75019

OSHA
1100 Campbell Rd., Suite 250
Richardson, TX 75081

~~OSI 10737 Spangler Road LLC~~
~~309 East Paces Ferry Rd. NE~~
~~Suite 60~~
~~Atlanta, GA 30305~~

~~OSI 10801 Spangler Road LLC~~
~~309 East Paces Ferry Rd. NE~~
~~Suite 60~~
~~Atlanta, GA 30305~~

OSI 2001 Manana Drive LLC
~~300 East Paces Ferry Road NE~~
~~Suite 60~~
Atlanta, GA 30305

Spectrum

Sunwest Communications Inc.
4851 LBJ Freeway
Dallas, TX 75224

~~Tara Energy~~
~~4925 Greenville Ave.~~
~~Dallas, TX 75206~~

TEKSworx
118 South 3rd St.
Williamburg, KY 40769

The Carbon Agency
802 N. Kealy Ave., Suite 200
Lewisville, TX 75057-3136

Natural Gas Vehicles Texas, Inc. 20 Largest Unsecured Creditors

1-800-Radiator & A/C
2626 Northhaven Road
Dallas, TX 75229

Cavalier Co.
196 Mark Lane
Royse City, TX 75189

Continental Tire
1830 MacMillian Park Dr.
Fort Mill, SC 29707

Cummins
PO Box 772642
Detroit, MI 48277-2642

Daltex Trailer Repair
3124 Partridge Ct.
Grand Prairie, TX 75052

Fleetpride Truck and Trailer Park
~~601 W Mockingbird Lane~~
~~Dallas, TX 75247~~

Geoff Beveridge
661 E Main St., Suite 200
Midlothian, TX 76065

HYLIION
1202 BMC Dr., Suite 100
Cedar Park, TX 78613

Imperial Supplier LLC
PO Box 5362
Janeville, WI 53547-5362

Marcel Pradella
2124 Dogwood Creek Ave.
Yukon, OK 73099

Premier Truck Group of Dallas No.
PO Box 840827
Dallas, TX 75284-0827

Recappers (V)
2360 East Grauwlyer
Irving, Texas 75061

Rush Enterprises
~~400 Cundiff Dr.~~
~~Seageville, TX 75159~~

Snap On
12617 E FM917 Suite E
Alvarado, TX 76009

Southern Tire Mart
816 W Mockingbird Dr.
Dallas, TX 75247

Southwest International Truck (V)
3722 Irving Blvd.
Dallas, TX 75247

U-line
PO Box 88741
Chicago, IL 60680-1741

Unifirst
~~PO Box 650841~~
~~Dallas, TX 75265-0481~~

Valvoline
3221 East Arkansas Lane
Arlington, Texas 76010

Z & Son Transmission
10418 C.F. Hawn Frwy
Dallas, TX 75217

Natural Gas Supply, LLC
20 Largest Unsecured Creditors

Comdata
5301 Mayland Way, Suite 100
Brentwood, TN 37027

Natural Gas Logistics Inc.
20 Largest Unsecured Creditors

~~Advantage Trailer Rentals~~
~~PO Box 772320~~
~~Detroit, MI 48277~~

Boscus Canada Inc.
900 Avenue Selkirk
Pointe-Clair QC H9R3S3

Comdata
5301 Mayland Way
Brentwood, TN 37027

Crossroads Trailer Service Inc.
226 Irby Lane
Irving, TX 75061

Crum & Foster
855 Winding Brook Dr.
Glastonbury, CT 06033

DCLI
3525 Whitehall Park Dr.
Charlotte, NC 02827

Enrique Joya

Escreen
PO Box 25902
Overland Park, KS 66225

Hartford Financial Services
PO Box 415738
Boston, MD 02241-5738

J.J. Keller
PO Box 6609
Carol Stream, IL 60197

Kay Polymer Trucking
1919 FM 565
Baytown, TX 77523

Lockton
PO Box 123036
Dallas, TX 75312-3036

Loves
PO Box 842568
Kansas City, MO 64184

McKinney Trailer Rentals
PO Box 515574
Los Angeles, CA 90051

McLeod Software
~~Dept. 3500~~
~~Birmingham, AL 35283~~

Mike Hendrixson
4819 Osprey Dr.
Orange Beach, AL 36561

Perez Luis Manuel Hernandez
c/o Paul R. Hornung
Domingo A. Garcia PC
1111 W Mockingbird Ln, Ste 1200
Dallas, TX 75247

Samba Holdings Inc.
Dept. LA 24536
Pasadena, CA 91185

Tonya Singh
c/o Jim S. Adler & Associates
2711 N. Haskell, Suite 2500
Dallas, TX 75204

TRAC Intermodal
750 College Road East
Princeton, NJ 08540

NOTICES OF APPEARANCE/PROOFS OF CLAIM

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c/o Patrick M. Lynch, Esq.
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c/o Robert G. Sanker, Esq.
Keating Muething & Klekamp PLL
One East Fourth St., Suite 1400
Cincinnati, OH 45202

FirstCapital Bank of Texas, N.A.
c/o Jared Knight, B. Hartman, C. Miller
Morgan Williamson LLP
701 S. Taylor, Suite 324
Amarillo, TX 79101

OSI 10801 Spangler, LLC, OSI 10737
Spangler, LLC, OSI 202 Mana Dr, LLC
c/o Mark Stromberg
Stromberg Stock PLLC
8350 N Central Expwy, Suite 1225
Dallas, TX 75206

Dallas County
c/o John K. Turner
Linebarger Goggan, et al.
2777 N. Stemmons Fwy, Suite 1000
Dallas, TX 75207

Bank of DeSoto, N.A.
c/o Law Office of Vicki K. McCarthy
114 South 5th Street
Midlothian, TX 76065

Mitsubishi HC Capital America, Inc.
c/o Matthew F. Kye, Esq
Kye Law Group, P.C.
201 Old Country Rd, Suite 120
Melville, NY 11747

Ford Motor Credit Company LLC
c/o Stephen G. Wilcox
Wilcox Law, PLLC
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Arlington, TX 76006

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c/o Trey A. Monsour
Fox Rothschild LLP
2501 N. Hartwood St., Suite 1800
Dallas, TX 75201

DalTex Trailer Repair
c/o Mark B. French
Law Office of Mark B. French
1901 Central Dr., Suite 704
Bedford, TX 76021

Premier Truck Group of Dallas North
c/o Marilee A. Madan, Esq.
5485 Belt Line Rd., Suite 290
Dallas, TX 75254

Uline
12575 Uline Drive
Pleasant Prairie, WI 53158

Fastenal Company
Attn: Legal
2001 Theurer Blvd.
Winona, MN 55987

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